



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 30, 2018

BY ECF

The Honorable Katherine B. Forrest
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: JUN 04 2018

Re: *United States v. Chi Ping Patrick Ho,*
17 Cr. 779 (KBF)

Dear Judge Forrest:

The Government respectfully submits this letter to request that the Court enter the enclosed Protective Order Pertaining to Classified Information (the "Protective Order") in the above-captioned matter. We have spoken with the defendant's counsel, and they have no objection to the Protective Order.

In addition, the Government respectfully requests with the consent of defense counsel a brief adjournment of its May 31, 2018 deadline to produce classified discovery in this case. While the Government expects to receive tomorrow internal authorization to produce classified discovery to cleared defense counsel, there are several technological and logistical issues that must be addressed in order to facilitate access to these materials by cleared defense counsel (including the Government's receipt of defense counsel's signatures on the enclosed proposed Memorandum of Understanding that is attached to the Protective Order). Accordingly, the Government respectfully requests that its classified discovery deadline be adjourned until June 11, 2018.

So ordered.

KBF. *[Signature]*
USDT

6/4/18

Honorable Katherine B. Forrest
United States District Judge
May 30, 2018
Page 2

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: s/ Daniel C. Richenthal
Daniel C. Richenthal
Douglas S. Zolkind
Thomas McKay
Andrew J. DeFilippis
Assistant United States Attorneys
(212) 637-2109/2418/2268/2231

SANDRA MOSER
Acting Chief, Fraud Section
Criminal Division

By: s/ David A. Last
David A. Last
Paul A. Hayden
Trial Attorneys
(202) 616-5651/353-9370

Enclosure

cc: (by ECF)

Counsel of Record